



VIA NAMING SERVICES PORTAL

Internet Corporation for Assigned Names and Numbers (ICANN)  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094  
US

June 24, 2022

RE: Registry-Registrar Agreement Proposed Amendments (.blackfriday, courses, .photo, .study)

Dear ICANN,

Pursuant to clause 2.9(a) of the Registry Agreements executed between ICANN and Registry Services, LLC, we submit the below-described changes to our Registry-Registrar Agreement.

We respectfully request prompt review in accordance with the Registry-Registrar Agreement (RRA) Amendment Procedure. In compliance with the procedure, we attach a 'redline' version showing the proposed changes to the current form of Registry-Registrar Agreement.

The changes proposed are for the purposes of streamlining and consolidating our Registry-Registrar Agreements following the recent acquisition of a number of TLDs. The changes to the Registry-Registrar Agreements are also described in the table below.

Section	Proposed Changes
UNR Registry-Registrar Agreement (.blackfriday and .photo)	
Recitals	Update to Registry details and listing of Registrar particulars. Remove references to UNR TLDs and refer to Exhibit C TLDs.
1. DEFINITIONS	Non-material formatting changes. Update definitions for consistency; remove specific references to UNR.
2. OBLIGATIONS OF REGISTRY OPERATOR 3. OBLIGATIONS OF REGISTRAR (Previously 2. OBLIGATIONS OF THE PARTIES)	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clauses related to access to Registry, Registry Tool Kit, support, Registry services, compliance actions, IDNs and RPMs for consistency with other RRAs. Addition of clause related to cooperation with technical analysis, URS, and TMCH periods for consistency with other RRAs.
3. LICENSE	Delete Section for consistency with other RRAs.
4. FEES	Align revision of fees clause for consistency with other RRAs. Insert references to Billing Policy. Amendment and removal of clauses to update section for consistency with other RRAs.

5. CONFIDENTIALITY AND INTELLECTUAL PROPERTY (Previously under 7. MISCELLANEOUS)	Amendment of clauses to update section for consistency with other RRAs.
6. INDEMNITIES AND LIMITATION OF LIABILITY (Previously under 7. MISCELLANEOUS and 6. LIMITATIONS, WARRANTIES AND DISCLAIMERS)	Amendment of clauses to update section for consistency with other RRAs.
7. DISPUTE RESOLUTION (Previously under 7. MISCELLANEOUS)	Amendment and removal of clauses to update section for consistency with other RRAs.
8. TERM AND TERMINATION (Previously 5. TERM AND TERMINATION)	Amendment and removal of clauses to update section for consistency with other RRAs.
9. MISCELLANEOUS (Previously 7. MISCELLANEOUS)	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clauses related to reservation of rights, and counterparts for consistency with other RRAs. Update to format of notices contacts. Update to signature section - new Registry Operator.
Exhibit A	New Exhibit A added.
Exhibit B (Data Processing Addendum)	Minor changes to Data Processing Addendum for consistency with other RRAs.
Exhibit C	New Exhibit C added.
.courses and .study Registry-Registrar Agreement	
Reference Schedule	Deleted for consistency with other RRAs
Recitals	Update to Registry details and listing of particulars.
1. DEFINITIONS	Non-material formatting changes. Update definitions for consistency.
2. AUTHORISATION AS REGISTRAR	Delete Section for consistency with other RRAs
2. OBLIGATIONS OF REGISTRY OPERATOR (Previously 4.)	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clauses related to access to Personal Data, Registry services, compliance actions, IDNs and RPMs for consistency with other RRAs.
3. OBLIGATIONS OF REGISTRAR (Previously 5.)	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clause related to cooperation with indemnification, technical analysis, resellers, transfers, compliance, authorization codes, cooperation and TMCH periods for consistency with other RRAs.

6. SPECIAL ALLOCATION	Delete Section for consistency with other RRAs.
7. ACCREDITATION	Delete Section for consistency with other RRAs.
4. FEES (Previously 8.)	Align revision of fees clause for consistency with other RRAs. Addition of clauses related to Billing Policy and Variable Registry-Level Fees. Amendment and removal of clauses to update section for consistency with other RRAs.
9. AUCTION INCENTIVE	Delete Section for consistency with other RRAs.
5. CONFIDENTIALITY AND INTELLECTUAL PROPERTY (Previously 10.)	Amendment of clauses to update section for consistency with other RRAs.
11. INSURANCE	Delete Section for consistency with other RRAs.
12. PERSONAL DATA	Delete Section for consistency with other RRAs.
6. INDEMNITIES AND LIMITATION OF LIABILITY (Previously 16. LIMITATION OF LIABILITY)	Amendment and removal of clauses to update section for consistency with other RRAs.
7. DISPUTE RESOLUTION (Previously 13.)	Amendment and removal of clauses to update section for consistency with other RRAs.
8. TERM AND TERMINATION (Previously 3. TERM and 15. TERMINATION)	Amendment and removal of clauses to update section for consistency with other RRAs. Addition of clauses related to termination for cause and bankruptcy.
9. MISCELLANEOUS (Previously 18.)	Amendment and removal of clauses to update section for consistency with other RRAs. Update to format of notices contacts. Addition of clauses related to representations and warranties, reservation of rights, attorneys fee, construction, and assurances, for consistency with other RRAs.
Schedules	Schedules 1-6 are replaced in their entirety with new Exhibits A-C

We look forward to receiving ICANN's response as prescribed by the review and approval procedures. Should you have any questions or require further information, please do not hesitate to contact us.

Regards,



Crystal Peterson, Director  
Registry Services, LLC